



Roadmap to Recovery®  
Advocacy and Action  
Roadmap to Preparedness

December 20, 2022

Director Dana Popish Severinghaus  
Illinois Department of Insurance  
122 South Michigan Avenue, 19<sup>th</sup> Floor  
Chicago, IL 60603

Dear Ms. Severinghaus,

United Policyholders is writing to express our strong support for HB2842.

This bill requires that automobile policy forms include coverage for vehicle theft, (commonly found in the “comprehensive coverage” section of a standard form contract) that is consistent with the reasonable expectations of the insured and the common understanding that if the vehicle gets stolen, regardless of how, the policy will indemnify the insured. There are myriad circumstances under which a car can be stolen without there being breakage or physical evidence of forced entry; the owner makes a quick stop at a gas station or a store and within the briefest moment a thief can hijack the vehicle, a thief can hotwire a car, gain entry to a garage and locate the car keys or fob. In fact, there are certain car manufacturers, most recently Hyundai and Kia, whose vehicles have been identified and targeted as easily stolen due to gaps in anti-theft protections built into their cars. Battery operated/electronic vehicle locking mechanisms have made vehicle theft without forced entry a common occurrence. Theft without evidence of forced entry does not mean the owner caused the theft. Where an insurer has evidence that an insured staged, intended or otherwise intentionally facilitated a vehicle theft - that is an entirely different scenario, and this bill will in no way prevent insurers from bringing forward that evidence and denying a claim in those circumstances.

The purpose of insurance is to indemnify the insured in case of loss, including loss due resulting from human errors and even negligence. Allowing insurers to draft limitations and exclusions that penalize insureds for human errors or circumstances beyond their control defeats that purpose and results in illusory coverage and unreimbursed losses. Illinois state law should not allow insurers to draft auto (or any other policy) loopholes that fail to distinguish between losses caused by intentional versus unintentional actions.

The reality is that having your car stolen is a significant risk that consumers seek to cover by purchasing comprehensive auto coverage. Insurers charge premiums that account for car theft losses, and they have ample resources to identify fraudulent auto theft claims. This bill will help maintain and restore essential coverage that has been a standard component of vehicle insurance coverage for decades.

Empowering the Insured

917 Irving St, Suite 4  
San Francisco, CA 94122

(415) 393-9990  
www.uphelp.org

United Policyholders is a non-profit 501(c)(3) organization, Tax ID 94-3162024.



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United Policyholders (“UP”) is a non-profit organization that has been informing, helping, and speaking for insurance consumers in the United States since 1991. UP’s work is funded by donations and grants and supported by a national volunteer corps.

United Policyholders appreciates your leadership and focus on protecting vehicle owners in the State of Illinois.

Warm regards,

A handwritten signature in black ink that reads "Amy Bach".

Amy Bach  
Executive Director

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